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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THERESA DANTE; TED HUSS; JULIET
HINRICHES; SAMANTHA OGGS;
MARGARET GATES,

Plaintiffs,

v.

JOSEPH SCHWARTZ; ROSIE SCHWARTZ;
SKYLINE HEALTH CARE, LLC; SKYLINE
MANAGEMENT GROUP, LLC;
CORNERSTONE QUALITY CARE, LLC;
COTTONWOOD HEALTHCARE, LLC;
FIRST LANDING INFORMATION SERVICES,
LLC; and JACK JAFFA a/k/a CHAVA JAFFA,

Defendants.

20-cv-01047 (JMV)(JBC)

**NOTICE OF MOTION
TO DISMISS AMENDED
COMPLAINT AS
AGAINST JACK JAFFA**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion to Dismiss Amended Complaint, dated July 30, 2021; the accompanying Declaration of Jeffrey I. Wasserman In Support of Motion to Dismiss Amended Complaint, dated July 30, 2021, and the exhibits thereto; and upon all prior pleadings and proceedings heretofore had herein, Defendant Jack Jaffa (“Jaffa”), by his undersigned counsel, shall move this Court, before the Honorable

John Michael Vazquez, at the United States Courthouse, 50 Walnut Street, Newark, New Jersey, on September 7, 2021, or such other date and time as the Court may determine, for an order (i) dismissing Plaintiffs' Amended Complaint as against Defendant Jaffa pursuant to Federal Rules of Civil Procedure 12(b)(6), with prejudice, for failure to state a claim upon which relief can be granted, and (ii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Jaffa respectfully requests oral argument. In accordance with Federal L.C.R. 7.1(e)(1), a proposed form of order is annexed.

Dated: Bridgewater, New Jersey
July 30, 2021

Respectfully submitted,

WASSERMAN LEGAL LLC

By: _____


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